

Carol, the clear impression of the SMNI team is that the LCSC is significantly under-resourced to effectively handle SMNI orders. In addition, poor workforce scheduling has frequently made a bad situation worse.

To illustrate, by special arrangement with BellSouth, SMNI recently submitted ASRs on 4/3 for 143 lines for a large business customer with an FOC return commitment of 4/10. Correct FOCs were not been received until 4/16.

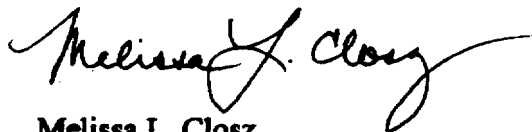
In another recent example, SMNI submitted ASRs on 3/17 with a 4/11 due date. Sprint had also sold this customer a PBX, and the customer requested that the service cut-over and PBX installation be handled concurrently. BellSouth was unable to locate the 3/17-dated ASR, was subsequently slow in responding, failing to return the FOC until 4/9, and on 4/10 determined that BellSouth would not be able to convert service on the requested due date. BellSouth requested an additional week to properly provision and prepare for the conversion. Needless to say, the entire cutover had to be postponed and the customer was furious.

Finally, three SMNI customer orders are currently delayed because of BellSouth's inability to properly provision an SMNI service order when the BellSouth service is provisioned utilizing a "DACS-mapped integrated SLC." For one of these customers, tests were performed while partnering with BellSouth to engineer service reusing the "DACS-mapped integrated SLC" facility. The tests were successful, SMNI special-ordered channel cards for its central office in order to provision the services and orders were subsequently submitted to BellSouth. BellSouth then informed SMNI that they were unable to process the orders and the conversions would be delayed until new facilities could be provisioned or until BellSouth could determine "how and if" they would provision this type of service request. The ASR for one of the three customers referenced was first submitted to BellSouth in September, 1996, and has been repeatedly scheduled, re-scheduled, and delayed.

Carol, I am asking for your assistance in addressing the above issues and would appreciate your response as to the nature and time-frames of the proposed resolutions.

Please contact me if you need additional detail. I look forward to your response.

Sincerely,



Melissa L. Closz

cc: Joe Baker- BellSouth  
George Head- Sprint  
Richard Warner- Sprint  
Bill Bolt- BellSouth



**BellSouth Interconnection Services** Fax 205 988-1688  
Suite 440 205 988-1700  
Two Chase Corporate Drive  
Birmingham, Alabama 35244

**Carol B. Jarman**  
Sales Assistant Vice President  
Sprint Account Team

April 25, 1997

**Ms. Melissa Closz**  
Director Local Market Development  
Sprint Metropolitan Networks, Inc.  
154 Southhall Lane Suite 4008  
Maitland, FL 32751

Dear Melissa:

Thank you for your letter dated April 18. You expressed several concerns and I will address each of them.

The first issue in your letter was BellSouth's failure to meet the 48 hour commitment on Firm Order Confirmations (FOC). The primary reason for this has been a lack of resources. We have been working diligently to increase our personnel. Next week we will add 14 service representatives to our Birmingham office to handle Unbundled Network Element service requests. In approximately 2 weeks, 18 additional service representatives will complete their basic training. This represents an increase of more than 300 percent and will enable the LCSC to process your service requests in a more timely manner and meet our 48 hour FOC commitment.

We recently implemented new software to improve the automated delivery of Customer Service Records. In addition, a Project Manager has been charged with reviewing the process, documenting procedures and assigning responsibilities. There will also be an additional management person to supervise the clerical staff.

As you are aware, the account team is working diligently to transition SMNI to EXACT, which is a mechanized service ordering interface. We have scheduled a visit to your Orlando offices on May 7-9 to help facilitate that transition and will bring several subject matter experts to give hands on training to your personnel. This will also contribute to a more timely flow of information.

Ms. Melissa Closz

Page 2

April 25, 1997

Your additional concerns also relate to a lack of resources. Once again, the increase in personnel should alleviate this problem. We are sorry that the responses you received when inquiring about your orders were not in keeping with your expectations or BellSouth's desire to provide you the best possible service. As set forth above, BellSouth is taking the necessary steps to make sure this does not happen again.

I am not in a position to give you a definite answer regarding "DACS-mapped integrated SLC." BellSouth does not have any Methods and Procedures (M&P's) in place for a DACS cutover. A change in company policy has to be made before we can provision these orders. However, this has been escalated and we will provide you with a status on this issue next week.

I sincerely apologize for any inconvenience we have caused your company. The account team is acutely aware of the importance of prompt response times for service and provisioning in today's local environment. Toward that end, we will continue champion your needs within BellSouth.



cc: George Head - Sprint  
Joe Baker - BellSouth  
Richard Warner - Sprint  
Bill Bolt - BellSouth



George V. Head  
Vice President  
Local Market Integration  
7301 College Blvd  
Overland Park KS 66210  
KSOPKV0203  
Phone: 913-534-6102  
Fax: 913-534-6304

May 1, 1997

BellSouth Telecommunications, Inc.  
Mr. Joseph M. Baker  
Vice President - Sales  
Interconnection Services  
675 West Peachtree Street, N. E.  
Suite 4423  
Atlanta, Georgia 30375

Dear Mr. Baker:

I am in receipt of Carol Jarman's letter to Melissa Closz dated April 27, 1997. I appreciate BellSouth meeting its Friday commitment with a response to the service difficulties we continue to experience. Carol and I also spoke briefly on Friday afternoon.

We agree with Carol's conclusion that BellSouth has not adequately staffed its LCSC. It has been our experience with other suppliers, however, that merely adding people, by itself, will not solve the service problem. Sprint recommends that a joint quality team be established that has the charter to mutually map the end-to-end process and identify opportunities for cycle time reduction and accuracy improvement. The team should also gain agreement on measurement metrics and metric calculation formulas and data sources.

Sprint also requests that, if not already in place, that BellSouth dedicate resources in its LCSC specifically to Sprint's account service needs. Sprint

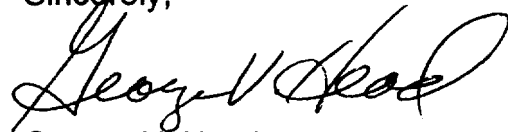
commits to provide timely forecasts to assist in appropriately sizing the group dedicated to Sprint's account.

We are hopeful that BellSouth's EXACT system will provide an acceptable interim interface for the local loop portion of SMNI service orders. The team that meets in Orlando next month should attempt to quantify the number and type of orders that may be processed through the EXACT automated interface.

With respect to BellSouth's 48 hour FOC commitment, it should be noted that Sprint does not consider 48 hour turn around to be an acceptable performance level. In a manual environment, Sprint believes that 24 hours is readily achievable. When automated processes are implemented, a 4 hour turnaround is expected and achievable. Absent this level of performance, BellSouth will be unable to meet its obligation to serve CLECs with the same speed and quality with which it serves its end user customers.

In our view, BellSouth has made no progress against its commitments made on January 23rd in Orlando. BellSouth's lack of performance has been harmful to Sprint's relationship with its customers, caused financial harm to Sprint and its customers, and is an impediment to the development of competition in Central Florida. As such, Sprint must regrettably insist that BellSouth fix its provisioning process, with demonstrated results, prior to 6-1-97. If not, Sprint will be forced to seek other remedies to achieve the service quality Sprint and its customers deserve and are legally entitled to receive.

Sincerely,



George V. Head

GVH:tlt

c: John Cascio  
Melissa Closz  
Ellen D'Amato  
Carol Jarman (BS)  
Rich Morris  
Bob Runke  
Gary Owens



---

**BellSouth Interconnection Services**  
Two Chase Corporate Drive, Suite 440  
Birmingham, Alabama 35244

May 2, 1997

Melissa Closz  
Director Local Market Development  
Sprint  
151 Southhall Lane, Suite 400B  
Maitland, FL 32751

Dear Melissa,

I would like to provide a status on an issue identified in your letter of April 18 regarding DACS mapped Integrated SLC. This issue has been escalated and appropriate resources assigned to study the issue. This is a non-standard procedure that involves manually provisioning circuits without a service order.

We do not want to use this method until we are convinced that we understand all of the impacts to your end user customer. We will continue to look at this issue to resolve these concerns and will update you as soon as possible.

*Carl*

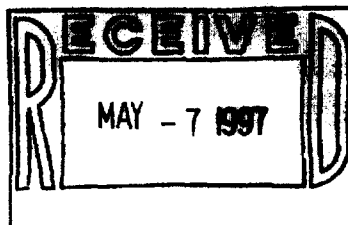


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404 527-7140  
Fax 404 523-0346

Joseph M. Reher  
Vice President - Sales  
Interconnection Services

May 5, 1997



Mr. George V. Head  
Vice President  
Local Market Integration  
Sprint  
7301 College Boulevard  
Overland Park, KS 66210

Dear George:

This letter is in reply to your correspondence of May 1, 1997. I hope you did not misunderstand Carol Jarman's explanation of what is being done to satisfy Sprint Metro's business requirements. BellSouth is committed to serving Sprint Metro in the best manner reasonably possible. I will, however, address the issues raised in order to prevent any misunderstanding concerning BellSouth's commitment to providing Sprint Metro and Sprint NIS with appropriate service levels.

As you know, BellSouth has already taken substantial steps to ensure that Sprint NIS receives an appropriate level of service. Sprint NIS's interface with BellSouth is through a dedicated account team. Moreover, a portion of this team is assigned to work with both Sprint NIS and Sprint Metro to facilitate their working relationships with BellSouth as they enter local markets in the Southeast. Further, a project manager and a newly appointed customer support manager have been added to the LCSC to provide additional support in processing orders and addressing service needs. We are in the process of establishing an implementation team of subject matter experts to facilitate our CLEC customer's start up operation. As soon as this team is in place and properly trained, we will set up a series of meetings with Sprint to review end-to-end processes and to look for ongoing improvements.

These managers and Sprint's account team are in daily contact with their counterparts at Sprint NIS, Sprint Metro, and the LCSC. BellSouth account management for Sprint Metro was transitioned to the Sprint Account Team in January in order to provide dedicated support that is experienced in dealing with Sprint and its requirements.

As Carol pointed out in her letter to Melissa Cioz, additional service representatives to handle service requests for unbundled network elements were added to the LCSC the week of April 28, and more representatives will complete training and join the LCSC staff the week of May 12. Though Sprint NIS has currently issued no orders for service, I believe, assuming BellSouth is provided reasonable forecasts from Sprint NIS in a timely fashion, the LCSC and the Sprint dedicated account team will be able to provide Sprint NIS with the proper level of service once Sprint NIS begins to place orders.

BellSouth has asked Sprint NIS for forecasts of the number of expected orders since December 1996. We appreciate that forecasting can be difficult, but to date the information BellSouth has received is too general to be useful for planning and staffing purposes. In order to be of value, BellSouth will need specific forecast information by month, state, number/type of lines (e.g., residence, business, trunks, ESSX/MultiServ, etc.), UNEs and number/type of service orders (new, disconnect, move, record only, change, etc.).

George V. Head  
Sprint

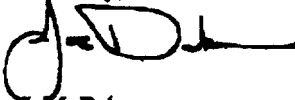
Page 2  
5/5/97

It was mentioned in your letter that Sprint does not consider the 48 hour FOC commitment acceptable; however, the 48 hour FOC commitment is recognized as the standard by Sprint Metro in Ms. Cleary's April 18 letter. BellSouth intends to fulfill its commitment to Sprint Metro in this regard. While the 48 hour FOC commitment is at issue between Sprint NIS and BellSouth in current contract negotiations, this disagreement does not support the observation that a 48 hour FOC commitment on the part of BellSouth is somehow improper or inappropriate.

Lastly, BellSouth will provide hands-on training to Sprint Metro on the EXACT system on May 8. This system should minimize manual intervention and streamline order flows. As you know, the account team and BellSouth's subject matter experts have worked extensively with Sprint NIS to set forth fully the options for electronic interfaces and to determine the best applications for Sprint NIS's use.

George, BellSouth values Sprint as a long term customer, and it is our desire to maintain a relationship with Sprint that is based upon mutual respect, trust and commitment. I can assure you BellSouth is committed to do what it can to promote a positive and productive business relationship with Sprint.

Sincerely,



J. M. Baker

Copy: Ellen D'Amato  
Carol Jarman  
Gary Owens  
Bob Runke





**Melissa Closz**  
Director-Local Market Development

**Local Market Integration**  
151 Southhall Lane, Suite 400B  
Maitland, FL 32751  
Voice: 407 875 1142  
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mclosz@banyon.utelsla.com

**May 19, 1997**

**Ms. Carol Jarman**  
Director- Sprint Account Team  
BellSouth Interconnection Services  
Suite 440  
Two Chase Corporate Drive  
Birmingham, AL 35244

**Dear Carol:**

**Thank you for your May 2 letter following up on the status of the "DACS-mapped integrated SLC" provisioning issue which has delayed the installation of several Sprint Metropolitan Networks (SMNI) customer orders. My response is for the purpose of providing clarification as to what the issue is and why its resolution is critical.**

**SMNI has placed unbundled loop service orders with BellSouth for several customers where the customer is currently provisioned by BellSouth utilizing a DACS-mapped integrated SLC-- essentially a "pair gain" device employed by BellSouth to maximize facility utilization. In attempting to provision unbundled loops for SMNI, BellSouth discovered that its systems and procedures did not support re-use of the existing facilities. Further, BellSouth did not have additional facilities available to turn up the unbundled loops ordered by SMNI. BellSouth then chose not to construct additional facilities in lieu of resolving the underlying systems and procedural issues in order to turn up the unbundled loops for SMNI. The result is that of the three service orders referenced in my 4/18 letter, two SMNI service installations were significantly delayed. The third installation was completed without the use of the SLC.**

**We have been advised by BellSouth personnel that these installations were completed for testing purposes only and that no additional installations of this type will be completed until BellSouth's procedural issues have been resolved. Moreover, we have been told that DACS-mapped integrated SLC provisioning configurations are widely-deployed throughout BellSouth meaning that SMNI will likely continue to encounter customers whose provisioning raises the same issues.**

Sprint appreciates BellSouth's desire to seek long term systems and process solutions for provisioning these services. However, our request is that future unbundled loop orders under this provisioning scenario be installed utilizing whatever interim procedures are necessary to complete the service order installations within mutually established intervals. This will enable BellSouth and Sprint to make progress toward our mutual goal of on-time service installations.

Carol, we would appreciate BellSouth's response to the request outlined above by Friday, May 30. Thanks again for your update, and I look forward to your response.

Sincerely,



Melissa L. Closz

Director - Local Market Development

cc: George Head- Sprint  
Richard Warner- Sprint  
Joe Baker- BellSouth



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205 968-1700

**Carol B. Jarman**  
Sales Assistant Vice President  
Sprint Account Team

May 23, 1997

Ms. Melissa Closz  
Director - Local Market Development  
Sprint Metropolitan Networks, Inc.  
151 Southhall Lane Suite 400B  
Maitland, FL 32751

Dear Melissa:

Thank you for your letter dated May 19, expressing concerns with regard to provisioning unbundled loop service via DACS-mapped IDLC.

As a point of clarification, the State of Florida has the largest concentration of DACS facilities in our service region. BellSouth has therefore been keenly aware of the impacts of this service in serving our CLEC customers, and in particular, Sprint Metro.

BellSouth intends to use a two-step procedure for meeting service requirements where facilities have been depleted. The first step will involve using "side door porting" and/or "hairpins" as a procedure to meet your service requirements. Essentially "side door porting" is the same procedure as cutting over a circuit from a DACS. We are developing new procedures to improve coordination between the various network departments that are involved in this complex procedure. We expect these new procedures to be in place by June 21, 1997. We have notified our internal departments of these changes. Prior to the availability of the new procedures, we will work to process any new or existing orders where such provisioning is involved.

The second step occurs after we have added new facilities where there were previously none. BellSouth may, at its discretion, convert the customer to the new facilities, thus requiring a second cutover for customers provisioned through the "side door porting" arrangement. We would like for you and to be aware of this possibility and to advise your end user customers as well.

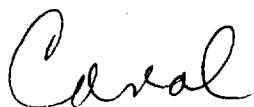
Ms. Melissa Closz

Page 2

May 23, 1997

We believe that this solution will resolve your concerns on provisioning circuits through DACS facilities. If you have additional questions or concerns, please let me know so that we can address them fully.

Sincerely,

A handwritten signature in cursive script, appearing to read "Carol".

cc: George Head  
Richard Warner  
Joe Baker



**BellSouth Interconnection Services**  
Suite 440  
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205 988-1700

**Carol B. Jarmen**  
Sales Assistant Vice President  
Sprint Account Team

June 12, 1997

Melissa Closz  
Director  
Local Market Development  
Sprint  
151 Southhall Lane #400B  
Maitland, Florida 32571

**Subject: Sprint Metro Outage In Orlando Magnolia 1AESS**

Dear Melissa:

This letter is to provide the details of the service outage to Sprint Metro in the Orlando Magnolia 1AESS office and to outline the steps BellSouth has taken to guard against a recurrence.

On June 4, 1997, BellSouth Project Manager Daryl Ducote received a call from Lori Doherty with Sprint Metro. Lori requested that two telephone numbers be added to a service order providing Remote Call Forwarding (RCF). This could not be done because the service order had been issued to complete on June 3. The Local Carrier Service Center (LCSC) did accept, however, a verbal request from Sprint Metro to place an order for RCF on the two lines. A new (N) service order (NY8FFPY5) was issued on June 6, 1997 at 1:26 PM. This N order was issued to remote call forward telephone numbers 407-481-2376 and 404-843-4817 to 407-206-2106 and 404-206-2105 respectively.

After the N service order was issued, the Service Representative realized that a change (C) service order should have been issued instead. She then canceled the N service order and issued a C service order. The C service order, (CY93T5D1), was issued to provide RCF for these lines. When the canceled N service order was received by the Recent Change Memory Assistance Group (RCMAG), the Line Translation Specialist (LTS) removed the numbers from the translations as well as the associated Simulated Facilities Group (SFG). Removal of the SFG resulted in the blocking of all incoming traffic for Sprint Metro from the RCF numbers in the Orlando Magnolia 1AESS switch.

A trouble report was received at 5:00 PM EDT from Sprint Metro. The Electronic Technician (ET) at the Unbundled Network Element Center (UNEC) called RCMAG to rebuild the SFG.

The SFG was successfully restored at approximately 6:15 PM EDT and the blocking of the existing Sprint Metro customers was cleared at that time.

Because the SFG had been removed, the original project for Mid Florida Pools had to be rebuilt and flowed back through the switch. This was accomplished by 7:00 PM EDT.

The following steps are being taken to guard against a recurrence of the problem discussed above:

1. Prepare and send a memo to NISC /RCMAG Directors by Friday, June 13th, to contain:
  - A. Account of the CLEC trunk outage in the Orlando Magnolia Central Office which occurred on June 6, 1997.
  - B. Require mandatory coverage for all CTG electronic technicians on Translation Bulletin No. 97-TB-46, issued May 23, 1997 and provide positive report to staff by June 20, 1997.
2. Re-transmit the Translation Bulletin 97-TB-46 to all NISC personnel by Friday, June 13th.
3. On June 11th, 1997, a second SFG was built in the 1AESS switch in the Orlando Magnolia Central Office to establish a hunt group arrangement that will provide "overflow" for CLEC trunk access.
4. Develop and deliver a package for quick restoral of the SFG in case of future outage to the RCMAG by June 20th, 1997.

We trust that the above information satisfies your request regarding the outage in the Orlando Magnolia Central Office. If you should have additional questions or concerns surrounding the outage, please let me know.



cc: Joe Baker  
Richard Warner



George V. Head  
Vice President  
Local Market Integration  
7301 College Blvd.  
Overland Park KS 66210  
KSOPKV0104  
Phone: 913-534-6102  
Fax: 913-534-6237

June 18, 1997

Mr. Joseph M. Baker  
Vice President - Sales  
BellSouth Telecommunications, Inc.  
Interconnection Services  
675 West Peachtree Street, N. E.  
Suite 443  
Atlanta, Georgia 30375

Dear Joe:

I am writing to again express serious concern regarding recent service problems in Orlando, Florida, and to request BellSouth's review and analysis of the situation in our meeting in Birmingham on June 24th. As you know, our teams have met many times to discuss service related difficulties being encountered by Sprint Metropolitan Networks, Inc. (SMNI), and yet they continue to occur.

During a three week period from May 19 to June 6, 1997, SMNI's customers encountered three significant service interruptions related to receiving calls through the BellSouth network. In each case, Sprint's customers could receive calls directly to their Sprint numbers but calls being call-forwarded through the BellSouth network could not be completed.

In the first occurrence, an "all circuits busy" condition was created on Monday morning, May 19, when interoffice traffic was reversed in error by Bell South in conjunction with trunk additions BellSouth was installing. Customers were impacted for 3 hours and over 20 trouble tickets were received.

The second incident, on May 30, revealed a translations problem in a BellSouth local switch whereby calls processed via the primary route were completed but the secondary route returned "no longer in service" or "can't be completed as dialed" messages. This service problem occurred for at least seven hours before it could be isolated and resolved by BellSouth.

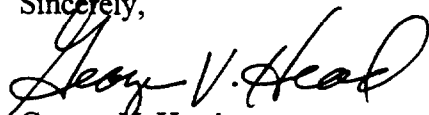
Most recently, on June 6, a simulated facilities group was removed from translations in error by BellSouth, again resulting in calls to SMNI customers being blocked for over two hours.

Attached for your review are the outage reports provided to Sprint by your account team after the first and third event. Each describes "human error" occurring in the translations support team. The second event, for which Sprint did not request a written report, occurred on May 31, 1997 and was also attributed to a translations error.

These errors by BellSouth have resulted in service deficiencies that have damaged Sprint's relationships with its end user customers and are impeding Sprint's ability to establish itself as a local service competitor in Central Florida. Even more disturbing is that these events occurred during a timeframe within which Sprint had requested, and BellSouth had agreed, to provide measurable and specific improvements in the service it provides to SMNI.

I look forward to seeing you and the BellSouth team on the 24th in Birmingham. I trust that BellSouth will have identified the irreversible corrective action on its translations process.

Sincerely,

  
George V. Head

cc: Melissa Closz - Sprint  
Carol Jarman - Bell South



**BellSouth Interconnection Services****Memorandum**

**Date** May 21, 1997  
**To** Linda McGee  
Jerry Johnson  
**From** Gretchen Wilson  
**Telephone Number** 205 988-1879  
**Fax Number** 205 988-7003  
**Subject** Sprint Metro Net routing problems

Linda:

Per your request, following are details relative to the traffic overflow problem in Orlando -

The problem occurred during the provisioning of the new IT groups. The routing in the Colonial Main and Tandem office was reversed on the turn up of the new group. The traffic was rerouted through the tandem and most of the overflows cleared. We had several conversations with Steve(Sprint Metro Net) to verify he was seeing the traffic. He indicated that he was still seeing some overflows. The ACAC verified all of Sprint Metro Net's NNXs in the nine offices where we established direct trunk groups. We found overflow routing problems in 4 offices. The ACAC obtained copies of the routing requests and proceeded to get the traffic rerouted, one office at a time, to insure that we did not cause Sprint Metro Net any additional problems.

To keep this same problem from reoccurring a copy of the routing request will be sent to the project manager to be included in the package for switched access. A copy of this same routing request will be provided to the switched access supervisor to be retained for the maintenance group. Switched access will verify the routing upon turn-up of any new IT group.



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Fax 205 988-1000  
205 988-1700

Carol E. Jordan  
Sales Assistant Vice President  
Sprint Account Team

June 12, 1997

Melissa Closz  
Director  
Local Market Development  
Sprint  
151 Southhall Lane #400B  
Maitland, Florida 32571

Subject: Sprint Metro Outage In Orlando Magnolia 1AESS

Dear Melissa:

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A trouble report was received at 5:00 PM EDT from Sprint Metro. The Electronic Technician (ET) at the Unbundled Network Element Center (UNEC) called RCMAG to rebuild the SFG.

-2-

The SFG was successfully restored at approximately 6:15 PM EDT and the blocking of the existing Sprint Metro customers was cleared at that time.

Because the SFG had been removed, the original project for Mid Florida Pools had to be rebuilt and flowed back through the switch. This was accomplished by 7:00 PM EDT.

The following steps are being taken to guard against a recurrence of the problem discussed above:

1. Prepare and send a memo to NISC /RCMAG Directors by Friday, June 13th, to contain:
  - A. Account of the CLEC trunk outage in the Orlando Magnolia Central Office which occurred on June 6, 1997.
  - B. Require mandatory coverage for all CTG electronic technicians on Translation Bulletin No. 97-TB-46, issued May 23, 1997 and provide positive report to staff by June 20, 1997.
2. Re-transmit the Translation Bulletin 97-TB-46 to all NISC personnel by Friday, June 13th.
3. On June 11th, 1997, a second SFG was built in the 1AESS switch in the Orlando Magnolia Central Office to establish a hunt group arrangement that will provide "overflow" for CLEC trunk access.
4. Develop and deliver a package for quick restoration of the SFG in case of future outage to the RCMAG by June 20th, 1997.

We trust that the above information satisfies your request regarding the outage in the Orlando Magnolia Central Office. If you should have additional questions or concerns surrounding the outage, please let me know.



cc: Joe Baker  
Richard Warner



BellSouth Telecommunications, Inc. 404 827-7140  
Suite 4423 Fax 404 823-8346  
675 West Peachtree Street, N.E.  
Atlanta, Georgia 30375

Joseph M. Baker  
Vice President - Sales  
Interconnection Services

July 1, 1997

Mr. John Cascio  
Vice President  
Sprint  
555 Lake Border Drive  
Apopka, Florida 32703

Dear John:

On behalf of BellSouth, I would like to apologize for the recent service interruption experienced by Sprint and its local exchange customers. We value our relationship with Sprint as one of BellSouth's largest wholesale customers, and it is always our intention to provide you with service that meets your standard for customer satisfaction.

This service interruption, which occurred at 5:21pm EDT on June 24, 1997 in BellSouth's Magnolia Central Office, was caused by a work error in our RCMAG (Recent Change Memory Assignment Group), the group responsible for handling translation software. As you know, BellSouth has put into place action plans to help prevent the error from happening again. These plans include short term measures such as the requirement for supervisory approval in these situations. We are also investigating with our vendors long term measures that include enhancing the software involved. Additionally, we have made changes to our methods and procedures to reduce the likelihood of these outages.

Again, BellSouth regrets any inconvenience this service interruption caused Sprint and its customers. We are committed to work cooperatively with Sprint throughout the nine state region to provide the level of service expected by you and your customers.

Yours truly,



J. M. Baker

Copy: George Head, Vice President - National Market Integration, Sprint  
Carol Jarman, Sales Assistant Vice President - Sprint, BST  
Krista Tillman, Vice President - Operations, BST



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**Carol B. Jarman**  
Sales Assistant Vice President  
Sprint Account Team

July 8, 1997

Ms. Melissa Closz  
Director - Local Market Development  
Sprint  
151 Southhall Lane Suite 400B  
Maitland, FL 32751

Dear Melissa:

I would like to follow up and provide you with a more detailed description of the events that led to the outage in the Magnolia office on June 24. The situation originated when Magna Computer called BellSouth's Small Business Services Center on June 20 to convert their service from SMNI back to BellSouth. A BellSouth representative in that office issued a disconnect (D) and new (N) order to initiate that process.

Due to that disconnect order, the office equipment for Magna Computer's telephone number was reassigned to another customer when a subsequent order flowed through our systems. When that order was processed, the service for Magna Computer as well as the entire Simulated Facility Group (SFG) was manually deleted from the switch in error. This prevented all of the customers that utilized Service Provider Number Portability (SPNP) in the Orlando Magnolia 1AESS Central Office from receiving incoming calls.

The duration of the outage was approximately 2.5 hours, and our time to repair after the trouble was reported to the UNE center was approximately one hour. The SFG was reprogrammed and the service re-established at 7:40 P.M.

Ms. Melissa Closz

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July 7, 1997

The following guidelines have been implemented to prevent future removal of SFGs in error:

1. Small Business Specialists have been retrained on the proper guidelines to use when issuing future orders.
2. On June 25, 1997, all employees in our Recent Change Memory Administration Group (RCMAG) were re-covered regarding the issues that encompass SFG usage for CLEC services in 1AESS offices.
3. Effective immediately, all SFG removals must require written approval from a translations supervisor. Additionally, our staff is currently working with Lucent Technologies to provide a permanent solution which will prevent SFG removal without complex translations involvement and we will status you on that as soon as possible.

In addition to these measures, plans are also underway to reserve SFG numbers 1 through 9 exclusively for the CLEC community. We will notify you in advance of our plans to migrate SMNI to a specific SFG and will again cover our employees regarding our policy not to disconnect that range of SFGs in general and SMNI's in particular.

Let me reiterate that BellSouth regrets any inconvenience this service interruption caused. Further, we are working diligently to identify and implement corrective actions that involve not only our translations processes, but all service issues that ultimately affect Sprint and its end users customers as well.

Sincerely,





**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Complaint of Sprint Communications )  
 Company Limited Partnership, d/b/a )  
 Sprint, and Sprint Metropolitan Networks, )  
 Inc., Against BellSouth Telecommunica- )  
 tions, Inc. )

Orders ☐  
 CORR. ☐  
 Plead. ☐  
 Dis. ☐  
 Test. ☐  
 Brief ☐  
 Other ☐  
 Filed: October 10, 1997

DATE RECEIVED

**RECEIVED**

OCT 13 '97

OCT 10 1997

FPSC - Records/Reporting

**COMPLAINT**

Come now Sprint Communications Company Limited Partnership ("Sprint") and Sprint Metropolitan Networks, Inc. ("SMNI")<sup>1</sup>, (collectively "Sprint/SMNI" or "Complainants"), pursuant to Rule 25-22.036, Florida Administrative Code, and hereby file this Complaint against BellSouth Telecommunications, Inc. ("BellSouth").

**The Parties**

1. Sprint, a Delaware limited partnership, is authorized by the Florida Public Service Commission ("Commission") to provide alternative local exchange and interexchange telecommunications services in the State of Florida. Sprint's business address is:

Sprint Communications Company Limited Partnership  
 3100 Cumberland Circle - Mailstop GAATLN0802  
 Atlanta, Georgia 30339

2. SMNI is a Florida corporation authorized by the Commission to provide alternative local exchange telecommunications service in the State of Florida. SMNI's business address is:

Sprint Metropolitan Networks, Inc.  
 151 Southhall Lane, Suite 400  
 Maitland, Florida 32751

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

<sup>1</sup> By letter dated September 30, 1997, SMNI and Sprint requested that the Florida Public Service Commission approve the transfer of SMNI's ALEC certificate No. 4390 to Sprint. See Exhibit "S" attached to this Complaint.



3. BellSouth is a Georgia corporation authorized by the Commission to provide local exchange and intraLATA interexchange service in the State of Florida. BellSouth's business address is:

BellSouth Telecommunications, Inc.  
150 South Monroe Street, Room 400  
Tallahassee, Florida 32301

### Introduction

4. As an early provider of competitive local exchange service in Florida, SMNI was one of the first competitors to request unbundled loops from BellSouth. SMNI began ordering and provisioning unbundled loops from BellSouth in May 1996 and, since that time, has experienced numerous delays in provisioning that continue to this date, 17 months later. In addition, BellSouth has been responsible for a number of service interruptions to SMNI customers prior to scheduled cutovers from BellSouth service to SMNI service. BellSouth technicians also have had numerous problems in implementing the remote call forwarding necessary to allow new SMNI customers to retain their "old" BellSouth telephone numbers. BellSouth's failure to properly provision local number portability has resulted in incoming callers to SMNI customers either receiving a disconnect message or experiencing endless ringing. This problem critically impacts business customers who rely on telephone service to conduct their daily business activities. BellSouth's continuing failure to provision unbundled loops and to implement remote call forwarding in an accurate and timely manner without service interruptions jeopardizes the ability of SMNI to attract and retain customers.

5. This matter has received attention at the highest management levels of both companies. Nonetheless, despite the executive attention devoted to these matters, SMNI continues to experience problems that impair its ability to enter the local exchange market in Florida on a broader scale because of the resulting increased customer acquisition costs and negative impact on the Sprint brand name. Therefore, Sprint and SMNI file this complaint and allege as follows: